

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

MAR 10 2020

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KENNETH BRANT,

Defendant.

CRIMINAL NO. 20-898 KWRCounts 1-2: 18 U.S.C. § 875(c):
Interstate Communication of Threats;Count 3: 18 U.S.C. §§ 2261(A)(2) and
2262: Cyber-Stalking.INDICTMENT

The Grand Jury charges:

Count 1

On or about October 7, 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **KENNETH BRANT**, knowingly and willfully did transmit in interstate and foreign commerce communications containing a threat to injure M.D.

In violation of 18 U.S.C. § 875(c).

Count 2

On or about December 12, 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **KENNETH BRANT**, knowingly and willfully did transmit in interstate and foreign commerce communications containing a threat to injure C.D.

In violation of 18 U.S.C. § 875(c).

Count 3

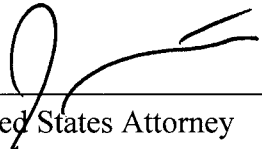
Between on or about August 15, 2018 and December 26, 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **KENNETH BRANT**, with the intent to harass and intimidate, and to place under surveillance with intent to harass and intimidate


C.D., used a facility of commerce, that is, the Internet, to engage in a course of conduct that caused, and would reasonably be expected to cause, fear of serious bodily injury and substantial emotional distress in C.D.

In violation of 18 U.S.C. §§ 2261(A)(2) and 2262.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney
 March 10, 2020